

TARTER KRINSKY & DROGIN LLP

Attorneys for Plaintiff

The Dannon Company, LLC

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE DANNON COMPANY, LLC,

Plaintiff,

-against-

FEDERICO MUYSHONDT,

Defendant.

Case No. 18-CV-01567 (KMK)

**NOTICE OF MOTION FOR
PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE that upon the annexed Declaration of Richard C. Schoenstein dated March 5, 2018; the Declaration of Dessislava Miteva dated February 21, 2018; the Declaration of Doug Behrens dated February 21, 2018; the Declaration of John P. Forames, Jr. dated February 22, 2018; and the accompanying Memorandum of Law in support of the motion, and the pleadings herein, Plaintiff The Dannon Company, LLC (“Dannon”) will move this Court, before the Hon. Kenneth M. Karas, United States District Judge, at the United States District Court for the Southern District of New York, 300 Quarropas Street, Room 521, White Plains, New York 10601, for an order pursuant to Rule 65 of the Federal Rules of Civil Procedure and pursuant to the Defend Trade Secrets Act, 18 U.S.C. § 1836, granting a preliminary injunction:

- (1) Prohibiting Muyschondt, and all those acting in concert with him from, whether directly or indirectly, using or disclosing Dannon's trade secrets and confidential information as defined in the Defend Trade Secrets Act and under New York common law; and
- (2) Ordering Muyschondt to return immediately to Dannon's counsel all trade secrets and confidential information that he possesses or controls.

Dated: New York, New York
March 5, 2018

TARTER KRINSKY & DROGIN LLP

By: /s/ Richard C. Schoenstein
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